



August 2, 2012

Bonnie D. Shealy

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VIA ELECTRONIC FILING

Jocelyn Boyd, Chief Clerk / Administrator Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Re: ORS Petition for Rule to Show Cause – Nexus Communications, Inc.

Docket No. 2012-253-C

Dear Jocelyn:

Enclosed for filing please find Nexus Communications, Inc.'s Answer to the Office of Regulatory Staff's Rule to Show Cause Petition. Nexus is in the process of obtaining a letter of credit to satisfy the requirements of 26 S.C. Reg. 103-607. By copy of this letter we are serving the same on the Office of Regulatory Staff. Should the Commission have any questions or need additional information, please contact me.

Very truly yours,

ROBINSON, McFadden & Moore, P.C.

Bonnie D. Shealy

/bds enclosure

cc/enc: C. Lessie Hammonds, ORS Attorney (via email & U.S. Mail)

Mr. Steven Fenker (via email)

John A. Groeber, Esquire (via email)

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2012-253-C

IN RE:)	
)	NEXUS COMMUNICATIONS, INC.'S
Petition of Office of Regulatory Staff)	ANSWER TO PETITION
For Commission to Order a Rule to)	
Show Cause as to Why the Certificates)	
Of Public Convenience and Necessity)	
For Certain Providers of)	
Telecommunications Services Should)	
Not be Revoked)	

Pursuant to 26 S.C. Regs. 103-826 and 103-830, Nexus Communications, Inc. ("Nexus") answers the allegations of the petition of the Office of Regulatory Staff for a Rule to Show Cause as follows:

- 1. Every allegation not specifically admitted is denied.
- 2. Nexus admits the allegations of paragraphs 1 and 2.
- 3. Nexus is without information sufficient to form a belief as to the allegations of paragraphs 3 through 7 regarding the other Companies listed in Exhibit A of the petition; and therefore, denies the same. Nexus admits that the allegations of paragraphs 3 through 7 in regard to Nexus.
- 4. Nexus is without information sufficient to form a belief as to the allegations of paragraph 8 regarding the other Companies listed in Exhibit A of the petition; and therefore, denies the same. Nexus would show that it received a partial waiver of the requirements of 26 S.C. Regs. 103-607; and that Nexus is in the process of obtaining a letter of credit from PNC Bank as required by the regulation. Nexus expects to have the security mechanism in place prior

to the hearing scheduled for September 12, 2012, and will file verification of the same with the Commission.

- 5. Nexus admits the allegations of paragraph 9, 11 and 12.
- 6. Nexus is without information sufficient to form a belief as to the allegations of paragraph 10 regarding the other Companies listed in Exhibit A of the petition; and therefore, denies the same. Nexus admits that the allegations of paragraph 10 in regard to Nexus.

Dated this 2nd day of August, 2012.

Robinson, McFadden & Moore, P.C.

Bonnie D. Shealy

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Attorney for Nexus Communications, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2012-253-C

In Re:)
)
Petition of Office of Regulatory Staff)
for Commission to Order a Rule to) CERTIFICATE OF SERVICE
Show Cause as to Why the Certificates)
of Public Convenience and Necessity for)
Certain Providers of)
Telecommunications Services should)
not be Revoked)
)

This is to certify that I, Toni C. Hawkins, a Paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **Nexus Communications, Inc.'s Answer to Petition** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

C. Lessie Hammonds, ORS Attorney SC Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

Dated at Columbia, South Carolina this 2^{nd} day of August, 2012.

Toni C. Hawkins

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